

Brown Bag 2012

General Permits for Stationary Emergency Internal Combustion Engines



Maricopa County
Air Quality Department



WALK MORE USE CFLS MORE CARPOOL MORE
BIKE MORE RAKE MORE TELECOMMUTE
MORE DRIVE HYBRIDS MORE CONSOLIDATE
ERRANDS MORE RIDE PUBLIC TRANSPORTATION
MORE USE ENERGY EFFICIENT APPLIANCES
MORE CARRY REUSABLE TOTE BAGS MORE
CONSIDER SOLAR MORE RUN COLD WATER
CYCLES MORE USE REUSABLE CONTAINERS
MORE CONSERVE ELECTRICITY MORE REDUCE
WOODBURNING MORE RECYCLE MORE USE
ELECTRIC LAWN AND GARDEN EQUIPMENT
MORE REFUEL AFTER DARK MORE RIDE
THE BUS MORE RIDE THE LIGHT RAIL MORE
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CLEAN AIR MAKE MORE

General Permits for Emergency Engines

- What type of stationary source permits does the Maricopa County Air Quality Department Issue?
 - Title V (Major sources) – Rule 210
 - Non-Title V (Medium size) – Rule 220
 - General (Small, similar sources) – Rule 230



General Permits for Emergency Engines

- What is the difference between a Non-Title V Permit and a General Permit?
 - NTV: Distinct, individual source for which a wide array of standards may apply.
 - GP: A group of similar sources that fall within a specific set of pre-determined parameters.

General Permits for Emergency Engines

- What General Permits are currently available?
 - Dry Cleaners
 - Dust Stationary Sources
 - External Fuel Burning (Boilers)
 - Gas Stations
 - Graphic Arts
 - Surface Coating
 - Vehicle Refinishing
 - Emergency Engines

General Permits for Emergency Engines

- General Permit vs. Authority to Operate
 - A General Permit is issued for an unlimited number of similar sources and contains the requirements for all sources subject to the permit.
 - An Authority to Operate is issued for a single source to operate under the requirements of a General Permit.
 - Or stated another way: “We hold the General Permit and you hold the ATO.”

- How many ATOs have been issued under each General Permit?
 - Dry Cleaners - 205
 - Dust Stationary Sources – 0 (New)
 - Fuel Burning - 532
 - Gas Stations - 1273
 - Graphic Arts - 62
 - Surface Coating - 77
 - Vehicle Refinishing - 283
 - Emergency Engines - 178

General Permits for Emergency Engines

- What is the advantage of holding an ATO under a General Permit?
 - \$\$\$ - Annual fees are currently \$340 vs. NTV \$640
 - Ease of application
 - Ease of renewal
 - Easier to make changes within the General Permit
- Disadvantages?
 - General Permit tends to contain more conditions than NTV, some of which may not apply
 - A little less flexibility

General Permits for Emergency Engines

- Who qualifies for an ATO under the General Permit for Emergency Engines?
 - The maximum aggregate power rating of all stationary ICE on the site is 2,500 horsepower or less.
 - All ICE are used only for emergency or standby purposes (i.e., backup generators).
 - No ICE at the facility is ever used for peak shaving purposes.

General Permits for Emergency Engines

- Who qualifies for an ATO under the General Permit for Emergency Engines?
 - If boilers and/or water heaters (external fuel burning equipment) with a heat rating greater than 300,000 BTU/hr are located at the facility:
 - The maximum combined heat input rating of all boilers and water heaters with a rating greater than 300,000 BTU/hr is less than 10 million BTU/hr, and
 - The boilers and water heaters are fueled only by natural gas, butane or propane.

- Who qualifies for an ATO under the General Permit for Emergency Engines?
 - No other equipment or operations requiring an air quality permit besides ICE and fuel burning equipment are used at the facility.
 - Facilities with lift stations (water or wastewater) that meet all other requirements in this section are eligible for the general permit as long as the requirements of Maricopa County Rule 320 - Odors and Gaseous Air Contaminants are met.

General Permits for Emergency Engines

- What type of facility does not require a General Permit for Emergency Engines?
 - When counting engines >50 HP, the total horsepower is <250 HP; or
 - The potential emissions at 500 hours of operation of all internal combustion engines combined is less than 4,000 pounds of nitrogen oxides or carbon monoxide per year. Use manufacturer's data at 100% load.

- If my source meets the qualifications, what is the process for obtaining an ATO?
 - Complete the application found at <http://www.maricopa.gov/aq/> → Permit applications → General Permit: Stationary Emergency Internal Combustion Engines
 - Submit application and permit fee of \$340 to One Stop Shop at 501 N. 44th Street
 - If you hold a NTV permit for the same source, request cancellation upon issuance of the ATO.

General Permits for Emergency Engines

- Permit Contents
 - General Requirements
 - General Operating Requirements
 - 40 CFR Part 60 Subpart IIII Requirements for Compression Ignition (Diesel) Engines
 - 40 CFR Part 60 Subpart JJJJ Requirements for Spark Ignition Engines
 - 40 CFR Part 63 Subpart ZZZZ Requirements for Reciprocating ICE

General Permits for Emergency Engines

- Additional Permit Conditions
 - Odor Control Requirements
 - Monitoring and Recordkeeping Requirements
 - Reporting Requirements
 - Fugitive Dust From Dust-Generating Operations

General Permits for Emergency Engines

- Miscellaneous Stuff
 - Duration of ATO
 - Annual fee = \$340 (subject to CPI)
- Questions??????

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<http://www.maricopa.gov/aq/>

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**MAKE
MORE**



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